REMARKS

Claims 1-5[1] are all the claims pending in the application. Claims 4 and 5 are withdrawn from consideration as being drawn to a non-elected invention. Claims 1-3 presently stand rejected.

Claim Objection

The Examiner has maintained the objection to claim 3 has allegedly being in improper multiple dependent form even though the claim 3 clearly refers to claims 1 and 2 *in the alternative only*. Claim 3 was previously amended to recite "according to Claims 1 or 2," which is in the *same format* as the first example listed at MPEP § 608.01(n). Therefore, Applicant respectfully requests the Examiner to withdraw this objection or to provide a specific suggestion regarding the Examiner's preferred format.

Claim Rejections Under 35 U.S.C. § 103

Claim 1 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Ito et al. (Japanese Patent Publication 2003-053734 (with English translation US 2004/0234637)) in view of *newly cited* Balter (US 6,660,212), and further in view of *newly cited* Oobayashi (US 2002/0079041).

Claims 2 and 3 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ito, Balter and Oobayashi, and further in view of Ogawa (US 2002/0014301).

[1] On the Office Action Summary page of the Office Action, the Examiner only indicates that claims 1-3 are pending.

Claim 1

Applicant respectfully traverses the rejection of independent claim 1 because there is no reasonable combination of Ito, Balter, and Oobayashi that would meet all of the claim's recitations. For example, there is no combination of these references that would meet the claimed system in which *the transfer device is provided with* a means for rotatably holding the vulcanizing tire *and rotating the tire based on an axis of the vulcanized tire*, and is capable of placing the vulcanized tire on a predetermined rotation position on the rim. That is, the claimed *transfer device itself* rotatably holds the tire and rotates the tire based on an axis of rotation of the tire.

The Examiner acknowledges that Ito does not disclose this feature, but asserts that it would have been obvious in view of *newly cited* Balter and Oobayashi.

JP 2003-053734 to Ito merely discloses that "a PCI station 15 is capable of supporting four tires at four locations, respectively, so as to enable simultaneous application of PCI to four tires, and is constituted to support the tires in postures for horizontally keeping the central axes." See Ito JP at paragraph [0038]. With respect to the tire transferring apparatus 75, Ito merely teaches that "a bladder containing tire transferring apparatus 75 is required to take a tire into and out of a mold opening/closing station 12, a shaping station 81, a PCI station 15, a green tire placing stand 16 and a vulcanized tire placing stand 17, with different postures of the tires at the respective positions. In this embodiment, the bladder-containing tire transferring apparatus 75 is constituted of a multi-articulation type of robot" (see Itoh JP at paragraph [0039]) and "the vulcanized bladder-containing tire 7 is transferred from the mold opening/closing station to the PCI station 15 by the bladder-containing tire transferring apparatus 75 and the treatment of PCI

is completed." See Itoh JP at paragraph [0068]. Thus, Ito does not specifically teach how the vulcanized tire is arranged in the PCI station 15.

With respect to Balter, the Examiner looks to a discussion of U.S. Patent No. 3,529,048 (Kovac et al.) in the *Prior Art Correction Methods* section of Balter and asserts that Balter teaches a means for rotating the tire based on the axis of the vulcanized tire. Applicant has listed Kovac, on which the Examiner relies, on a concurrently filed IDS so that the record is clear regarding the disclosure in Kovac.

Neither Balter nor Kovac makes up for the deficiencies in Itoh. Kovac merely discloses that "freshly molded tires B ... are mounted on the rim 21 using conventional tire mounting techniques." See Kovac at 4:73- 5:1. There is no disclosure regarding how the tires are mounted on this rim 21. Moreover, the means for rotating the tire pointed out by the Examiner and shown in Fig. 1 of Kovac, for example, is provided to enable a vulcanized tire, after it has been mounted on the rim 21, to be forced on a shaft 14, which is rotated by a motor 19 arranged on a base 10, thereby rotating the tire. Thus, the rotation means asserted by the Examiner does not rotate the tire so as to be placed on a predetermined rotation position on the rim, and it *is not provided on a transferring means*, as is required by claim 1. Accordingly, Kovac as cited in Balter does not make up for the deficiencies in Itoh.

Moreover, Oobayashi also does not make up for this deficiency.

Thus, Applicant respectfully requests the Examiner to withdraw the rejection of claim 1.

Claims 2 and 3

With respect to dependent claims 2 and 3, Applicant respectfully requests the Examiner to withdraw the rejection at least because of their dependency from claim 1 and because Ogawa does not make up for the deficiencies discussed above.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/John M. Bird/

John M. Bird
Registration No. 46,027

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: November 18, 2009